

UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF MASSACHUSETTS

Civil Action No. 04-11456-RWZ

GENERAL ELECTRIC MORTGAGE)
INSURANCE CORPORATION,)
Plaintiff,)
Judgment Creditor,)
v.)
CHI CHEN)
A/K/A CHI CHEN HU,)
A/K/A TRACY CHEN,)
Defendant)
Judgment Debtor.)

F I L E D
Clerk's Office
USDC, Mass.
Date 5-17-05
By Deputy Clerk

**MOTION OF GENERAL ELECTRIC MORTGAGE
INSURANCE CORPORATION
TO AMEND COMPLAINT UNDER FED R. CIV. P. 15**

In this action, General Electric Mortgage Insurance Corporation (“GEMIC”) seeks to amend its complaint under Fed. R. Civ. P. 15 against defendant Chi Chen a/k/a Chi Chen Hu a/k/a Tracy Chen (“Tracy Chen”) by adding an additional party defendant, Cheng Yih Hu, her co-judgment debtor. GEMIC has served Tracy Chen with process who has neither appeared nor answered. GEMIC believes no party in interest will object; the Court has already entertained argument concerning this motion. The amended complaint is attached.

Wherefore, GEMIC moves the Court for an order that leave be granted for an amended complaint.

General Electric Mortgage Insurance Corporation,
Plaintiff Judgment Creditor,
By its attorney,

Richard W. Gannett, Esquire
BBO # 184430
Gannett & Associates
165 Friend Street, Suite 200
Boston, MA 02114-2025
(617)367-0606

CERTIFICATE OF SERVICE

I hereby certify that I have served the within motion to amend complaint under Fed R. Civ. P. 15 together with amended complaint upon the Clerk of Court United States District Court 1 Courthouse Way Boston, MA 02210 on May 17, 2005 and I served the amended complaint in hand upon Michael B. Feinman, Esquire Feinman Law Offices 23 Main Street Andover, MA 01810 on May 16, 2005.

Richard W. Gannett